

UNITED STATES DISTRICT COURT FOR THE EASTERN  
DISTRICT OF PENNSYLVANIA

---

DOCKET NUMBER: 11-4579

---

LOCAL UNION NO. 98,  
INTERNATIONAL BROTHERHOOD OF  
ELECTRICAL WORKERS, et al.

Plaintiffs

v

RGB SERVICES, LLC, et al.

Defendants

---

**PLAINTIFFS' EXHIBITS AND ATTACHMENTS IN SUPPORT OF  
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT  
PURSUANT TO RULE 56 OF THE FEDERAL RULES CIVIL PROCEDURE**

---

**MARINO, CONROY & COYLE**

301 Wharton Street

Philadelphia, Pa 19147

Telephone (215) 462-3200

Telecopier (215) 462-4763

By: **STEVEN F. MARINO, ESQUIRE**

Attorney I.D. 53034

Attorneys for Plaintiffs

**INDEX OF APPENDIX EXHIBITS**

1. Letter of Assent and Voice-Data-Video Agreement, Supplements, Addendums and Appendices
2. Deposition Michael Metsikas March 23, 2012
3. Affidavit of Ed Coppinger
4. Complaint
5. Defendants' Answer to Plaintiffs' Complaint and Affirmative Defenses
6. Declaration of Trust Agreement establishing the Local Union No. 98, International Brotherhood of Electrical Workers Sound and Communication Health & Welfare Fund and amendments thereto
7. Declaration of Trust Agreement establishing the Local Union No. 98, International Brotherhood of Electrical Workers Profit Sharing Fund [also referred to as The Deferred Income Plan] and amendments thereto
8. Declaration of Trust Agreement establishing the Electrical Workers Joint Apprenticeship and Training Trust Fund
9. Declaration of Trust Agreement establishing the Labor Management Cooperation Fund
10. Restated Employees Benefit Agreement and Trust for the National Electrical Benefit Fund
11. Expert Report of certified public accountant Jacquelyn K. Coyle, CPA. and curriculum vitae
12. Deposition Jacquelyn K. Coyle, CPA May 25, 2012
13. Affidavit of Marco Rivera
14. Affidavit of Deb Gerber
15. Report generated by report dated May 24, 2012, generated by Chad Staller, J.D., M.B.A., M.A.C. and James Markham, Ph.D. J.D. CPCU
16. Affidavit of Jeffrey P. Scarpello, Esquire